

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

DECLARATION OF BRIAN SEEVE
IN SUPPORT OF PLAINTIFF’S OPPOSITION TO
THE MOTION OF DEFENDANT FOR SUMMARY JUDGMENT OF
NON-INFRINGEMENT

I, Brian Seeve, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC (“Singular”), in this action. I submit this declaration in support of Singular’s opposition to the motion of defendant, Google LLC (“Google”), for summary judgment of non-infringement.
2. Attached as Exhibit A is a true and correct copy of excerpts from the Rebuttal Expert Report of Martin Walker, Ph.D dated March 3, 2023.
3. Attached as Exhibit B is a true and correct copy of excerpts from the deposition of Martin Walker, Ph.D dated March 31, 2023.
4. Attached as Exhibit C is a true and correct copy of U.S. Patent No. 9,218,156.
5. Attached as Exhibit D is a true and correct copy of excerpts from the deposition of Miriam Leaser, Ph.D. dated March 8, 2023.

6. Attached as Exhibit E is a true and correct copy of excerpts of the Opening Expert Report of Dr. John J. Gustafson Regarding the Invalidity of the Asserted Patents dated December 22, 2022.

7. Attached as Exhibit F is a true and correct copy of an email produced by Google bearing bates reference GOOG-SING-00113604.

8. Attached as Exhibit G is a true and correct copy of U.S. Patent No. 8,407,273.

Executed at Boston, Massachusetts on May 19, 2023.

/s/ Brian Seeve